

SUSAN JANE BROWN (OSB #054607)  
SANGYE INCE-JOHANNSEN (OSB #193827)  
Western Environmental Law Center  
120 Shelton McMurphey Blvd., Ste. 340  
Eugene, Oregon 97401  
(503) 914-1323 | Phone  
(541) 778-6626 | Phone  
brown@westernlaw.org  
sangyeij@westernlaw.org

BRODIA NARDI MINTER (OSB #164414)  
Klamath Siskiyou Wildlands Center  
P.O. Box 102  
Ashland, Oregon 97520  
(541) 488-5789 | Phone  
Brodia@kswild.org

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

KLAMATH-SISKIYOU WILDLANDS  
CENTER, OREGON WILD, CASCADIA  
WILDLANDS, and SODA MOUNTAIN  
WILDERNESS COUNCIL,

*Plaintiffs,*

vs.

UNITED STATES BUREAU OF LAND  
MANAGEMENT,

*Defendant.*

Civ. Case No. 1:19-cv-02069-CL

**FIRST DECLARATION OF DAVE  
WILLIS**

I, DAVE WILLIS, declare and state as follows:

1. I am the current Chairperson and a 1984 charter board member of the Soda Mountain Wilderness Council (“SMWC”). I am also an employee and member of SMWC, which is a registered non-profit corporation in Oregon. I am also member of Oregon Wild and the Klamath-

Siskiyou Wildlands Center (“KS Wild”). In coordination with these organizations, I regularly submit comments to the BLM on federal land management proposals such as Griffin Half Moon, that may impact wildlife.

2. SMWC has approximately 300 members and mails to a list of ~3,200 addresses. Our members and supporters are interested in and support SMWC’s decades of work to protect the forests of the Cascade-Siskiyou biological connectivity area for these forests’ ecological and aesthetic values.

3. I have lived in the Greensprings neighborhood surrounded by the Ashland Resource Area of the Medford BLM District for four decades and constantly and regularly enjoy visiting and exploring native and mature BLM forests here. I fully intend to continue to spend considerable future time visiting, exploring, and enjoying native forests on public lands in the Ashland Resource Area, including forests in and around the area of BLM’s proposed Griffin Half Moon timber sale. The proposed logging and roading on BLM lands in BLM’s proposed Griffin Half Moon timber sale will remove trees and degrade forest character that I personally value and that SMWC seeks to protect and enhance.

4. I have spent considerable time exploring and enjoying mature forests in the Ashland Resource Area – especially the general portion of BLM’s Ashland Resource Area east of Interstate 5 in which BLM’s proposed Griffin Half Moon timber sale is located. The recreational and ecological values provided by the remaining intact native and mature forests in the Jenny Creek Watershed and adjacent watersheds in which BLM’s proposed Griffin Half Moon timber logging units are located are increasingly rare because of the surrounding public/private “checkerboard” land ownership pattern. It is my understanding from professional biologists that these lands have regional importance as habitat for Pacific fisher and Great Gray Owls.

5. I derive unspeakable satisfaction from visiting intact forests in this biodiverse melding area of the southern Cascade-Range and Siskiyou Mountains. The more intact the forests are, the more I enjoy them – knowing that intact forests provide better habitat for rare and imperiled species like Pacific fishers and Great Gray Owls, two native forest species of many that we did not create and cannot replace. The personal value I place on intact forests is why I have dedicated decades of my professional life to protecting and trying to protect forest ecosystems and the native species that depend on them in this local Cascade-Siskiyou area and elsewhere. I would be both personally and professionally harmed by the logging, roading, and habitat degradation proposed in BLM's Griffin Half Moon timber sale.

6. Over the past several decades, I have commented upon many previous proposed BLM plans, including timber sales in Ashland Resource Area and Medford BLM District. I have successfully advocated for several protective federal designations in the general Cascade-Siskiyou area where the Griffin Half Moon timber sale is proposed.

7. That this Medford BLM project proposes to road and log known Great Gray Owl nesting sites and Pacific Fisher habitat is very troubling to me. This focus is highly unwarranted, given what ornithologists tell me is the restricted and isolated range of Great Gray Owls. Further, the rare Pacific fisher needs its dwindling habitat protected and enhanced, not further degraded.

Dated: March 12, 2020.

Respectfully submitted,

/s/ Dave Willis  
Dave Willis